

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
INBOUND INTERNATIONAL EXPEDITED SERVICES 2
(MC2009-10)

Docket No.
CP2011-66

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO ORDER NO. 784
(August 8, 2011)

The Postal Service hereby responds to Commission Order No. 784. In that Order, the Commission directed that the Postal Service provide its EMS Cooperative Report Cards, including performance measurements, for calendar year 2010.¹ The Postal Service is accordingly providing its quarterly report cards as well as an annual summary. These documents are furnished under seal; redacted copies are provided as attachments to this Notice. With respect to the documents filed under seal with this Response, the Postal Service hereby incorporates by reference its Application for Non-Public Treatment, which was filed in this docket as an attachment to the Postal Service's Notice filed on July 28, 2011 with the following updates:²

In section 3, add the following:

Information contained in the EMS Report Cards includes delivery, tracking, and service performance information, which is commercially sensitive.

In section 4, add the following:

¹ PRC Order No. 784, Notice and Order Concerning Filing of Changes in Rates for Inbound International Expedited Services 2, Docket No. CP2011-66, July 29, 2011, at 3.

² Notice of the United States Postal Service of Filing Changes in Rates Not of General Applicability and Application for Non-Public Treatment of Materials Filed Under Seal, Docket Nos. MC2009-10 and CP2011-66, July 28, 2011, at Attachment 1.

Competitors could use the delivery, tracking, and service performance information in the EMS Report Cards to assess the offers and representations made to customers by the Postal Service for any possible comparative vulnerabilities and to focus sales and marketing efforts on those areas, to the detriment of the Postal Service.

In section 5, add the following:

Harm: Competitors could use delivery, tracking, and service performance information in the EMS Report Cards to assess vulnerabilities and focus sales and marketing efforts to the Postal Service's detriment.

Hypothetical: The information in the EMS Report Cards is released to the public. Another expedited delivery service's employee monitors the filing of this information and passes the information along to its sales and marketing functions. The competitor then uses the delivery, tracking, and service performance information as a concrete comparison point, advertising itself to potential customers as offering performance better than the Postal Service.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Anthony F. Alverno
Chief Counsel, Global Business

Laree K. Martin

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-3816; Fax -5628
Laree.K.Martin@usps.gov
August 8, 2011

EMS Cooperative Report Cards

Prepared by PricewaterhouseCoopers

Period

1. Quarter 2010 Aggregate Report Card

EMS Operator

United States of America

1. Delivery Performance

Indicator	Current result	Last quarterly result	Current global result
Delivery on-time			
No delivery information			
Items Held in Customs			

Results based on information provided by International Postal Corporation (IPC) using systems validated by PricewaterhouseCoopers (PwC). PwC is not responsible for the data shown in the results.

2. Call Center performance

Information published in the EMS Operational Guide	Current Result
Phone number	<input checked="" type="checkbox"/>
Fax number	<input checked="" type="checkbox"/>
E-mail	<input type="checkbox"/>

Indicator	Current result	Last quarterly result	Current global result
Phone answered within 20 seconds			
Fax answered			
E-mail answered			
Response on-time through Rugby System			

Results based on measurements/test carried out by PwC.

3. Tracking

Indicator	Current result	Last quarterly result	Current global result
EMA over EMC			
EMD over EMC			
EMF over EME			
EMH/EMI over EMD			
Transmission on-time			

REDES over PREDES			
RESCON over PRECON			

Missing EMH/EMI events			
No delivery zone indicator			
No Office of Exchange Code			
EMH/EMI before EMD			
No Standard			

Results based on information provided by IPC using systems validated by PwC. PwC is not responsible for the data shown in the results.

4. EMS Service Identification

Indicator	Current result
Presence of item barcode	Yes
EMS item identifier according to UPU Standard S10b	Yes
Presence of receptacle barcode	Yes
EMS receptacle identifier according to UPU Standard S9	Yes

Results based on information provided by IPC using systems validated by PwC. PwC is not responsible for the data shown in the results.

5. EMS Service Information

Indicator	Current result
Provision of Written Proof of Delivery - WPOD	Yes
EMS Operational Guide update	Yes
Participation in EMS Pay-for-Performance	Yes

Results based on information provided by the EMS Unit using procedures validated by PwC



EMS Cooperative Report Cards

Prepared by PricewaterhouseCoopers

Period

2. Quarter 2010 Aggregate Report Card

EMS Operator

United States of America

1. Delivery Performance

Indicator	Current result	Last quarterly result	Current global result
Delivery on-time			
No delivery information			
Items Held in Customs			

Results based on information provided by International Postal Corporation (IPC) using systems validated by PricewaterhouseCoopers (PwC). PwC is not responsible for the data shown in the results.

2. Call Center performance

Information published in the EMS Operational Guide	Current Result
Phone number	<input checked="" type="checkbox"/>
Fax number	<input checked="" type="checkbox"/>
E-mail	<input type="checkbox"/>

Indicator	Current result	Last quarterly result	Current global result
Phone answered within 20 seconds			
Fax answered			
E-mail answered			
Response on-time through Rugby System			

Results based on measurements/test carried out by PwC.

3. Tracking

Indicator	Current result	Last quarterly result	Current global result
EMA over EMC			
EMD over EMC			
EMF over EME			
EMH/EMI over EMD			
Transmission on-time			

RESDES over PREDES			
RESCON over PRECON			

Missing EMH/EMI events			
No delivery zone indicator			
No Office of Exchange Code			
EMH/EMI before EMD			
No Standard			

Results based on information provided by IPC using systems validated by PwC. PwC is not responsible for the data shown in the results.

4. EMS Service Identification

Indicator	Current result
Presence of item barcode	Yes
EMS item identifier according to UPU Standard S10b	Yes
Presence of receptacle barcode	Yes
EMS receptacle identifier according to UPU Standard S9	Yes

Results based on information provided by IPC using systems validated by PwC. PwC is not responsible for the data shown in the results.

5. EMS Service Information

Indicator	Current result
Provision of Written Proof of Delivery - WPOD	Yes
EMS Operational Guide update	Yes
Participation in EMS Pay-for-Performance	Yes

Results based on information provided by the EMS Unit using procedures validated by PwC.



EMS Cooperative Report Cards

Prepared by PricewaterhouseCoopers

Period

3. Quarter 2010 Aggregate Report Card

EMS Operator

United States of America

1. Delivery Performance

Indicator	Current result	Last quarterly result	Current global result
Delivery on-time			
No delivery information			
Items Held in Customs			

Results based on information provided by International Postal Corporation (IPC) using systems validated by PricewaterhouseCoopers (PwC). PwC is not responsible for the data shown in the results.

2. Call Center performance

Information published in the EMS Operational Guide	Current Result
Phone number	<input checked="" type="checkbox"/>
Fax number	<input checked="" type="checkbox"/>
E-mail	<input type="checkbox"/>

Indicator	Current result	Last quarterly result	Current global result
Phone answered within 20 seconds			
Fax answered			
E-mail answered			
Response on-time through Rugby System			

Results based on measurements/test carried out by PwC.

3. Tracking

Indicator	Current result	Last quarterly result	Current global result
EMA over EMC			
EMD over EMC			
EMF over EME			
EMH/EMI over EMD			
Transmission on-time			

RESDES over PREDES			
RESCON over PRECON			

Missing EMH/EMI events			
No delivery zone indicator			
No Office of Exchange Code			
EMH/EMI before EMD			
No Standard			

Results based on information provided by IPC using systems validated by PwC. PwC is not responsible for the data shown in the results.

4. EMS Service Identification

Indicator	Current result
Presence of item barcode	Yes
EMS item identifier according to UPU Standard S10b	Yes
Presence of receptacle barcode	Yes
EMS receptacle identifier according to UPU Standard S9	Yes

Results based on information provided by IPC using systems validated by PwC. PwC is not responsible for the data shown in the results.

5. EMS Service Information

Indicator	Current result
Provision of Written Proof of Delivery - WPOD	Yes
EMS Operational Guide update	Yes
Participation in EMS Pay-for-Performance	Yes

Results based on information provided by the EMS Unit using procedures validated by PwC.



EMS Cooperative Report Cards

Prepared by PricewaterhouseCoopers

Period

4. Quarter 2010 Aggregate Report Card

EMS Operator

United States of America

1. Delivery Performance

Indicator	Current result	Last quarterly result	Current global result
Delivery on-time			
No delivery information			
Items Held in Customs			

Results based on information provided by International Postal Corporation (IPC) using systems validated by PricewaterhouseCoopers (PwC). PwC is not responsible for the data shown in the results.

2. Call Center performance

Information published in the EMS Operational Guide	Current Result
Phone number	<input checked="" type="checkbox"/>
Fax number	<input checked="" type="checkbox"/>
E-mail	<input type="checkbox"/>

Indicator	Current result	Last quarterly result	Current global result
Phone answered within 20 seconds			
Fax answered			
E-mail answered			
Response on-time through Rugby System			

Results based on measurements/test carried out by PwC.

3. Tracking

Indicator	Current result	Last quarterly result	Current global result
EMA over EMC			
EMD over EMC			
EMF over EME			
EMH/EMI over EMD			
Transmission on-time			

RESDES over PREDES			
RESCON over PRECON			

Missing EMH/EMI events			
No delivery zone indicator			
No Office of Exchange Code			
EMH/EMI before EMD			
No Standard			

Results based on information provided by IPC using systems validated by PwC. PwC is not responsible for the data shown in the results.

4. EMS Service Identification

Indicator	Current result
Presence of item barcode	Yes
EMS item identifier according to UPU Standard S10b	Yes
Presence of receptacle barcode	Yes
EMS receptacle identifier according to UPU Standard S9	Yes

Results based on information provided by IPC using systems validated by PwC. PwC is not responsible for the data shown in the results.

5. EMS Service Information

Indicator	Current result
Provision of Written Proof of Delivery - WPOD	Yes
EMS Operational Guide update	Yes
Participation in EMS Pay-for-Performance	Yes

Results based on information provided by the EMS Unit using procedures validated by PwC.



1. Delivery Performance

Indicator	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual Score
Delivery on-time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery 1 day late	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery 2 days late	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery 3 days late	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delivery more than 3 days late	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No delivery information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Items Held in Customs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Tracking

Indicator	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual Score
EMA over EMC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EMC over EMA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EMD over EMC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EMC over EMD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EMF over EME	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EMF over EMD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EMH/EMI over EMD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EMD over EMH/EMI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transmission on-time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RESDES over PREDESv2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
RESCON over PRECON	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Missing EMH/EMI events	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No delivery zone indicator	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Office of Exchange Code	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EMH/EMI before EMD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Standard	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. Call Center performance

Indicator	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual Score
Response on-time through Rugby	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Phone answered within 20 seconds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Phone answered in between 20 seconds and 1 minute	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Phone busy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Phone not answered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accessibility by fax 24 hours a day	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Response by fax within 24 hours	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accessibility by e-mail 24 hours a day	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Response by e-mail within 24 hours	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4. EMS Service Identification

Indicator	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual Score
Presence of item barcode	Yes	Yes	Yes	Yes	Yes
EMS item identifier according to UPU Standard S10b7	Yes	Yes	Yes	Yes	Yes
Presence of receptacle barcode	Yes	Yes	Yes	Yes	Yes
EMS receptacle identifier according to UPU Standard S9	Yes	Yes	Yes	Yes	Yes

5. EMS Service Information

Indicator	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual Score
Provision of Written Proof of Delivery -	Yes	Yes	Yes	Yes	Yes
EMS Operational Guide update	Yes	Yes	Yes	Yes	Yes
Participation in EMS Pay-for-Performance	Yes	Yes	Yes	Yes	Yes

